

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 SHAWN P. COOK
Deputy Attorney General
4 State Bar No. 117851
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-9954
6 Facsimile: (213) 897-2804
Attorneys for Complainant
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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No.

2011-823

13 **BONNIE SUE BETTS**
11306 Pearl St., Apt. #101
14 Los Angeles, CA 90064
Registered Nurse License No. 442981, Nurse
15 Practitioner Certificate No. 15404, Public
Health Nurse Certificate No. 46374; and
Nurse Practitioner Furnishing Certificate
16 No. 15404

A C C U S A T I O N

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about August 31, 1989, the Board of Registered Nursing issued Registered
24 Nurse License Number 442981 to Bonnie Sue Betts (Respondent). Respondent was issued Nurse
25 Practitioner certificate NP 15404 on November 9, 2004; Public Health Nurse certificate PHN
26 46374 on June 26, 1990 and NPF 15404 certificate on January 29, 2007. The Registered Nurse
27 License and all advanced certificates were in full force and effect at all times relevant to the
28 charges brought herein and will expire on July 31, 2011, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

STATUTORY PROVISIONS

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

6. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:"

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

8. California Code of Regulations, title 16, section 1444, states:

A conviction or act shall be considered to be substantially related to the qualifications, functions or duties of a registered nurse if to a substantial degree it evidences the present or potential unfitness of a registered nurse to practice in a manner consistent with the public health, safety, or welfare. . . . "

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FIRST CAUSE FOR DISCIPLINE

(General Unprofessional Conduct)

9. Respondent is subject to disciplinary action under sections 2750 and 2761, subd. (a), in conjunction with California Code of Regulations, title 16, section 1444, in that she committed an act of general unprofessional conduct that is substantially related to the practice of registered nursing. The circumstances are as follows:

10. Respondent began working as a registered nurse at HealthCare Partners of Long Beach, CA ("HP") in or about March, 2005. In or about January, 2008, Respondent was working as a Telehealth Nurse for HP at a call center in Torrance, where her duties were answering medical questions by phone, and as a triage nurse after normal business hours.

11. The call center facility is an office type environment, with no emergency medical equipment, and no medications or narcotics of any type, with no doctor assigned to the facility.

12. On or about January 27, 2008, Respondent was working at the HP call center on a 5pm to 1 am part-time shift, together with another RN, Nurse M.

13. On at least one prior occasion, Respondent had hydrated herself by starting an IV with Lactated Ringer's solution ("LR") while working at another health care facility, CR, where she was concurrently working in or about January, 2008.

14. On or about January 27, 2008 when she came to her shift at HP from her other job at CR, Respondent brought an IV kit from CR, including one liter of pre-mixed LR, butterfly needle, tubing, gloves, and other supplies to start an IV. Respondent planned on hydrating herself for about 30 minutes on a break, while she was working at HP. Respondent B had previously discussed starting an IV on herself with Nurse M. Respondent and Nurse M were coworkers and had become friends over the more than a year they were working together at HP.

15. Sometime between 9 and 11 pm, while Respondent was on break, Nurse M assisted Respondent with both inserting the butterfly needle intravenously and hanging the IV from the cubicle.

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1 16. After the IV had been running for between 10 and 15 minutes, Respondent's
2 supervisor showed up and told Respondent and Nurse M to unhook the IV. Both Respondent and
3 Nurse M were immediately suspended and ultimately terminated from their employment at HP.

4 PRAYER

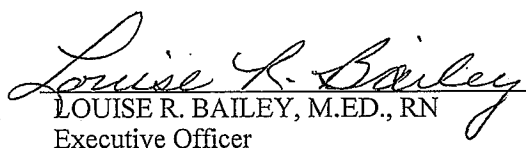
5 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
6 and that following the hearing, the Board of Registered Nursing issue a decision:

7 1. Revoking or suspending Registered Nurse License Number 442981 and all advanced
8 certificates issued to Bonnie Sue Betts;

9 2. Ordering Bonnie Sue Betts to pay the Board of Registered Nursing the reasonable
10 costs of the investigation and enforcement of this case, pursuant to Business and Professions
11 Code section 125.3;

12 3. Taking such other and further action as deemed necessary and proper.

13 DATED: 4/6/11


14 LOUISE R. BAILEY, M.ED., RN
15 Executive Officer
16 Board of Registered Nursing
17 Department of Consumer Affairs
18 State of California
19 Complainant

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21 accusation.rtf
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